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## **U.S.** Department of Justice

United States Attorney Southern District of New York

**MEMO ENDORSED** 

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 29, 2023

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## **BY EMAIL**

The Honorable Valerie E. Caproni United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Jonathan Laureano, 22 Cr. 670 (VEC)

Dear Judge Caproni:

The Government respectfully submits this letter to move with the defense's consent to exclude time under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, through May 30, 2023, the date to which the Court recently adjourned trial. *See* Dkt. 33.

At a conference on February 21, 2023, the Court set a trial date of May 1, 2023, and excluded time through that date under the Speedy Trial Act to give the defendant's then-recently substituted counsel adequate time to prepare for trial. *See* Dkt. 24. On March 28, 2023, the Court granted in part and denied in part the defendant's motion to adjourn the trial, and set a new trial date of May 30, 2023. *See* Dkt. 33.

Excluding the time between May 1 and May 30 would provide both parties "the reasonable time necessary for effective preparation" for trial, 18 U.S.C. § 3161(h)(7)(B)(iv), outweighing the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

by:

Justin Horton Jeffrey W. Coyle

Assistant United States Attorneys

(212) 637-2276

cc: Jesse M. Siegel, Esq.

Christopher A. DeGennaro, Esq.

Application GRANTED.

SO ORDERED.

Date: 3/30/2023

HON. VALERIE CAPRONI UNITED STATES DISTRICT JUDGE